

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, ex rel.	)	
T.J. NOVAK	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 18 C 5452
	)	
WALGREENS BOOTS ALLIANCE,	)	
INC.,	)	Judge Lefkow
	)	
Defendant.	)	

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**JOINT MOTION FOR ENTRY OF SCHEDULE**  
**REGARDING ATTORNEY'S FEES**

Plaintiff-Relator T.J. Novak ("Novak"), and Defendant Walgreens Boots Alliance, Inc. ("Walgreens"), move, pursuant to Local Rule 54.3 and Federal Rule of Evidence 54, for the entry of a schedule regarding a potential motion by Novak regarding his entitlement to attorney's fees and expenses. In support of this motion, Novak and Walgreens state as follows:

1. This case involves the United States' complaint in intervention and Novak's *qui tam* action, both alleging that Walgreens violated the False Claims Act by submitting false claims for controlled substances. Dkt. 21, 58. The United States' complaint in intervention also alleges violations of the Controlled Substance Act. Dkt. 58.

2. In response to the Joint Motion of Dismissal filed by the United States, Novak, and Walgreens (Dkt. 70), this Court, by order dated April 21, 2025, dismissed the United States' Amended Complaint in Intervention and Novak's Second Amended Complaint. But the Court retained jurisdiction over, among other things, Novak's claim against Walgreens for recovery of attorney's fees, expenses and costs pursuant to 31 U.S.C. § 3730(d). Dkt. 72.

3. Pursuant to Northern District of Illinois Local Rule 54.3 (“LR 54.3”), Novak and Walgreens are required to meet and confer regarding any potential motion by a party for the award of fees and/or costs. LR 54.3 sets forth certain deadlines for the parties to exchange information, confer regarding objections (if any) to certain fee requests, and, if necessary, to create a joint statement regarding the issues in dispute regarding the fee request. Under LR 54.3(b), the Court may modify the deadlines set forth in LR 54.3.

4. Novak has provided Walgreens with certain information regarding the amount of fees, expenses and costs he contends he is entitled to pursuant to 31 U.S.C. § 3730(d). Novak and Walgreens have conferred regarding Novak’s contentions and have agreed, subject to this Court’s approval, to an appropriate schedule for attempting to reach a consensual resolution of Novak’s claims, and for meeting the requirements of LR 54.3. Based on that agreement, Novak and Walgreens request that the Court enter the following schedule:

June 9, 2025 – Novak shall comply with LR 54.3(d)(1)-(4) by providing Walgreens with all information required pursuant to those provisions.

July 28, 2025 – Walgreens shall comply with the first paragraph of Local Rule 54.3(d)(5), and subsections (A)-(D) thereunder, by providing Novak with all information required pursuant to those provisions.

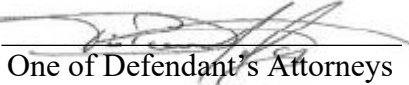
August 25, 2025 – Novak and Walgreens shall comply with Local Rule 54.3(d)(5) by identifying all hours, billing rates, or related nontaxable expenses (if any) that will and will not be objected to, the basis of any objections and the specific hours, billing rates, and related nontaxable expenses that in the parties’ respective views are reasonable and should be compensated. The parties will thereafter attempt to resolve any remaining disputes.

September 22, 2025 – The parties shall comply with Local Rule 54.3(e) by filing a joint

statement setting forth the information specified in such provision.

October 13, 2025 – Novak shall file his motion for attorneys’ fees, expenses and costs.

WHEREFORE, Novak and Walgreens respectfully request that the Court enter an order setting the above schedule for the parties to comply with LR 54.3 and Federal Rule of Civil Procedure 54.

<p><b>T.J. NOVAK</b>, Plaintiff-Relator</p> <p>By: <u>s/s Michael C. Rosenblat</u> One of His Attorneys</p> <p>MICHAEL C. ROSENBLAT, P.C. 707 Skokie Boulevard – Suite 600 Northbrook, Illinois 60062-2841 (224) 331-1611 mike@rosenblatlaw.com</p> <p>David J. Chizewer William C. Meyers GOLDBERG KOHN LTD. 55 East Monroe Street – Suite 3300 Chicago, Illinois 60603 (312) 201-4000 david.chizewer@goldbergkohn.com (312) 201-3919 william.meyers@goldbergkohn.com</p>	<p><b>WALGREENS BOOTS ALLIANCE, INC. LLC</b>, Defendant</p> <p>By: <u>/s/ </u> One of Defendant’s Attorneys</p> <p>Tinos Diamantatos MORGAN, LEWIS &amp; BOCKIUS, LLP 110 N. Wacker Dr. Chicago, Illinois 60606 (312) 324-1000 tinios.diamantatos@morganlewis.com</p>
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**CERTIFICATE OF SERVICE**

I, Michael C. Rosenblat, an attorney, certify that I caused copies of the foregoing Joint Motion for Entry of Schedule Regarding Attorneys' Fees to be served pursuant to ECF as to Filing Users.

/s/ Michael C. Rosenblat